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Comments

To: Forest Service - USDA

Subject: 2011 Proposed Planning Rule

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Attached are my comments on the proposed National Forest System Land Management Planning Rule, published in the Federal Register on Feb. 14, 2011. I appreciate the opportunity to comment on this important Rule that has the potential to affect our use, and enjoyment, of the national forests.

I am a retired Forest Service employee with 30 years of experience with the agency, about one-half of which was spent directly on a forest planning team preparing a forest plan.

There are many aspects of the proposed rule I agree with, like the species diversity concept using the course filter/fine filter approach; the requirement for the Forest Supervisor to be the Responsible Official, instead of the Regional Forester; and especially the emphasis on multiple use as a driving force in planning. In the last 2 decades we have tended to forget the multiple use mandate. I am glad to see it emphasized again.

I will not dwell on the areas I like however, but instead concentrate on the areas I disagree with. I believe that will be a better use of both of our times. My biggest disagreement is with the planning framework in Section 219.7. There are, in my opinion, several major components of planning that are missing from the proposal. So damaging are these omissions that the Rule is completely unworkable and will not achieve the desired result, which is to "maintain, protect and restore NFS lands while providing for sustainable multiple uses, including ecosystem services, so that NFS lands continuously provide ecosystem functions and contribute to social and economic sustainability."

The first component that is missing is Desired Future Condition (DFC). The DFC provides a vision of what the people in a region want the forest to look like, and be like, in 40 or 50 years from now. Do they want a forest that is mostly managed with an assortment of vegetative tools that produces a healthy, resilient ecosystem with a mosaic of different species and age classes on the landscape? Or do people want a forest that is mostly unmanaged and "natural-looking", with few vegetation tools, that produces whatever nature chooses (including large areas of dead, dying and fire scared trees)? Or do people want some combination of both?

Without a DFC there is no "target" to aim for, and the forest is like a ship at sea without a rudder, being pushed in whatever direction the wind is blowing at the time, and with no destination. Forest officials need a compass so they know in which direction management should be headed. The DFC is that compass!

You may argue the "desired conditions" provided in the proposed plan do provide that compass direction. But the DFC is more than the sum total of the individual desired conditions for each of the important ecological, social and economic resources on the forest. The DFC is the driving force that causes all of those individual desired conditions to occur somewhat in sync.

Another component that is missing (at least in part) is mandatory goals. Goals are those broad general statements that describe how the DFC will be achieved, and they form the basis from which objectives will be developed. Goals can be, likely will be, different for different alternatives, but once the final alternative is selected, those goals will become the direction for the forest plan.

Your proposed rule makes goals optional at the whim of the Forest Supervisor. But the compass direction toward which the forest is headed is not the purview of the Forest Supervisor. It is the sole responsibility of the American people who comment on, and who are actively involved in, the decision of what the forest will look like, and be like, in 40 to 50 years. Therefore those goals need to be mandatory so a new forest supervisor cannot come in and arbitrarily change the goals of the forest to provide greater "flexibility" (read that to mean "opportunity to change"). If there is a need to change direction that should occur through a revision, not because some forest supervisor is not comfortable with the goals that were set. It's a trust thing, and you don't have it! The Forest Service has to win that trust back before the American people will return it to them. For now, goals should be mandatory.

The third component that is missing from Section 219.7 is management prescriptions. Management prescriptions are small subsets of a national forest that have specific, unique direction for that smaller area (like non-motorized recreation use or timber harvest with big game emphasis). Management prescriptions act as receptacles that you pour standards and guidelines (S&G's) into to achieve the objectives and goals for that area. Without management prescription areas all of the S&G's for a forest would have to be poured into one massive forest container. Since S&G's sometimes conflict, you would not know which S&G's to apply to which areas of the forest to meet the objectives. The sum of all of those management prescriptions add up to the total direction for the entire forest.

Still another missing component is landscape management. Landscape areas (sometimes referred to as ecological units or subsections) are based on climatic and topographic features that lump different soil, aspect and vegetation types into large blocks that are ecologically similar and respond to management activities in a similar fashion. They are usually 150,000 acres or more in size. The most important use of landscape units is that they address ecosystem elements like wildlife habitat and biological diversity on an area larger than a timber sale but smaller than the forest as a whole. This allows forest officials to address these ecosystem elements on a larger operational level than a timber sale. For instance, there may be a goal to achieve a certain amount of overmature vegetation of a certain type on a forest. This goal could be broken down to a specific objective (like percent of area or total acres) for each landscape unit. If a project (like a timber sale) occurs in that landscape unit, officials might determine that the project will eliminate 20% of the overmature trees in the sale area, but that will be less than 1% of the overmature vegetation in the entire landscape. On the other hand, the timber project might increase early seral vegetation from zero to 10% within the landscape, and therefore actually improve biological diversity in that landscape. These kinds of larger assessments cannot occur on a project-level basis and are the essence of landscape management. A landscape approach is mentioned as important several times in the proposed rule. If not as I described, then how?

In the final analysis it is not necessary to describe how landscape management will be done for each Forest, but that landscape direction must be placed in the planning rule to insure that it is done. If landscape management is not specified in the plan, it will not happen.

The final component missing from the planning rule is plan monitoring. Yes, you do have a Section (219.12) on monitoring in the proposed rule, but it lacks the sharp, pithy direction it needs to make monitoring work. Monitoring has always been the weak link in forest planning. No forest I ever saw actually sat down at the end of each year to see if the objectives were being met, and if not, what needed to happen to make sure the objectives are met in the future. Because if the objectives are not met it is unlikely the goals will be met (except by luck or coincidence), and if the goals are not met it is highly likely the DFC for the forest will not be met. It is at this point [monitoring] that forest plans are literally put on the shelf to collect dust, except for standards and guidelines to direct project planning. S&G's do not, by themselves, insure that the goals and DFC for the forest will be accomplished however.

To correct this problem I believe there must be direction in the Rule that requires an analysis of the objectives, and how well those objectives are being met, at years 3, 6 and 10 of the planning period. Start at year 3 to see, early in the planning period, if plan accomplishment is starting to stray from the desired direction so there is time to correct it; at year 6 to follow-up on the 3 year analysis and see if the trend is changing and if so, in what direction; and at year 10 to analyze the entire 10 year planning period to see if the objectives for the period were met and if not, what action needs to be taken to get the DFC for the forest back on track. My proposed monitoring process will allow the public to engage in joint problem-solving with forest personnel to decide what actions need to be taken to correct discrepancies between the DFC and where the forest is actually headed.

I also believe this analysis at years 3, 6 and 10 should be in the form of a report from the national forest to the citizens of the surrounding counties. As the owners of the national forests, they should be appraised of the direction in which the forest is headed and given an opportunity to respond to that information.

Monitoring is the "eyes" of the forest plan. It looks out there to see what is actually being done on the ground. No other aspect of the planning process does that. If we are not willing to have a comprehensive monitoring plan like I suggest we might just as well not even bother with forest planning. Just develop a list of S&G's to guide project planning for timber sales, grazing allotments, mining, and road construction and accept whatever you get from nature as the end result, whatever that is!

To summarize, following are the major components that I believe need to occur in Section 219.7 of the planning rule:

1. DFC - A vision of what people want the national forest to look like, and be like, in 40 or 50 years;
2. GOALS - Forest goals to move the forest in the direction of the DFC over time;
3. OBJECTIVES - Measurable objectives that target the goals;
4. MANAGEMENT PRESCRIPTIONS - Management prescriptions to pour S&G's into which provide direction for specific subsets of the forest that, in total, meet the objectives and goals for the forest;
5. STANDARDS AND GUIDELINES - S&G's which accomplish projects on the ground in an environmentally sound manner while working to meet objectives;
6. MONITORING - Strict monitoring requirements to make sure the objectives are being accomplished to meet the goals; and
7. LANDSCAPE MANAGEMENT APPROACH - Identify landscape ecological units to insure that a landscape approach is used in forest planning.

The proposed rule does not need to identify how each of the major components will be accomplished on each national forest in the national forest system, but the rule does need to ensure that each of the components is specifically addressed on each forest. The "how to" can be put in the National Forest Handbook.

OTHER COMMENTS

A few comments on other parts of the proposed rule that bug me.

Best Science

I believe the proposed rule places way too much emphasis on "best science" as the controlling factor in determining what the overall direction for a forest plan should be. The rule correctly points out that science is important to inform the decision, but does not mention that it is the combined values and beliefs of all of the people collaborating on the forest plan that eventually determines the direction for the forest, not science.

The proposed rule should take the additional step to point out that while "best science" is important, it is values and beliefs that drive the decision process. You might even say a few words about values and beliefs and where they come from and why they are so important.

Fine Filter

The proposed rule correctly adopts the course filter/fine filter approach as the paradigm for maintaining species diversity. The course/fine filter approach replaces "species viability" as the best way to achieve species diversity because no one could ever explain what species viability was or what it looked like if you ever got it. Viability was never a working concept.

But there is one thing that perplexes me about the double filter concept. How do you know when a species has fallen through the course filter and is lying there helplessly entrapped in the fine filter? What specific mechanism announces that change so we know a species now has special needs? I don't think that identification process has to

be in the planning rule, but we do need to know when it has occurred. Perhaps you could expound on this point in the background portion of the rule for biodiversity so we all know when that "fall through" thing happens.

That concludes my comments. I appreciate the opportunity to comment on the proposed rule. I hope you will give strong consideration to my suggestion to add a few more components to the planning rule, especially the suggestion to add additional monitoring requirements.

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